

**GREENBERG TRAURIG, LLP**

Hal M. Hirsch (HH 0417)

David Jay (DJ 7221)

200 Park Avenue

Florham Park, New Jersey 07932

Phone: (973) 360-7900

Fax: (973) 301-8410

*Attorneys for Joseph P. LaSala and Fred S. Zeidman,  
as Co-Trustees of the AremisSoft Liquidating Trust, Plaintiffs*

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY**

JOSEPH P. LASALA and  
FRED S. ZEIDMAN, as CO-TRUSTEES of  
the AREMISSOFT CORPORATION  
LIQUIDATING TRUST,

Plaintiffs,

v.

MARIFIN POPULAR BANK PUBLIC  
COMPANY, LTD.,

Defendants.

Civil Action No.  
09-CV-00968(JAP)

**PLAINTIFFS' JURISDICTION DOCUMENT REQUESTS**

PLEASE TAKE NOTICE that, pursuant to the Court's order and Fed. R. Civ. P. 26 *et seq.*, plaintiffs Joseph P. LaSala and Fred S. Zeidman, as Co-Trustees (the "Co-Trustees") of the AremisSoft Corporation Liquidating Trust (the "Trust"), hereby request that defendant Marifin Popular Bank Public Company, Ltd. (the "Bank") produce for inspection and copying all documents requested below at the office of Greenberg Traurig, LLP, 200 Park Avenue, Florham Park, New Jersey 07932. Definitions and Instructions follow.

## **DEFINITIONS AND INSTRUCTIONS**

A. “AremisSoft” means AremisSoft Corporation, and includes, as the case may be, any predecessor, successor, corporate parent, affiliate, subsidiary, division, and any partner, officer, director, , employee, shareholder, beneficiary thereof and any accountant, attorney, agent, representative, or any other person acting on its behalf or under its control or direction.

B. “Bank” or “You” means Marifin Popular Bank Public Company, Ltd. and includes, as the case may be, any predecessor, successor, corporate parent, affiliate, subsidiary, division, and any partner, officer, director, , employee, shareholder, beneficiary thereof and any accountant, attorney, agent, representative, or any other person acting on its behalf or under its control or direction.

C. “Communication” means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).

D. “Concerning” means referring to, describing, evidencing, or constituting.

E. “Document” is defined to be synonymous in the meaning and equal in scope to the usage of this term in Fed. R. Civ. P. 34(a).

F. “Olde Monmouth” means all Old Monmouth Stock Transfer Company, Inc., and includes, as the case may be, affiliated entities, predecessors, successors, beneficiaries, representatives, accountants, attorneys, parents, affiliates, officers, directors, subsidiaries, divisions, employees, agents, and any person acting on its behalf or under its control or direction.

G. “Person” is defined as any natural person or any business, legal, or governmental entity or association.

H. Each request shall be construed independently and no request limits the scope of any other request.

I. With respect to each responsive document you claim to be privileged or to constitute work product, please identify:

(i) the person who prepared or authored the document and all recipients or addressees, including recipients of copies; and state

(ii) the date on which the document was prepared or transmitted;

(iii) the nature of the document (e.g., letter, memorandum, notice, etc.);

(iv) the general subject matter of the document; and

(v) the privilege asserted.

J. If any document requested herein was at one time in existence but is no longer in existence or has been lost, discarded, destroyed or is not now in your possession, custody or control, please so state, specifying in detail for each document: the type of document, the types of information contained therein, the date on which the document ceased to exist or became lost, the circumstances under which the document ceased to exist or became lost, and the identity and current address of all persons having knowledge or who had knowledge of the contents of the document which ceased to exist or became lost.

K. This Request shall be deemed to be continuing so as to require you to promptly notify the undersigned counsel about the existence of any document that is not produced in response to this Request and which relates to any document request herein.

Notice and production to the undersigned counsel shall be made as soon as possible after any such document is in your possession, custody, or control.

L. Unless otherwise stated or the context otherwise requires, the time period covered by these Request is January 1, 1999 to the present.

### **DOCUMENTS REQUESTED**

1. All account records for AremisSoft and AremisSoft affiliates.
2. All documents concerning communications with AremisSoft, including but not limited to, records of all telephone conversations with AremisSoft representatives, including Roys Poyiadjis and Lycourgos Kyprianou.
3. All documents concerning communications with Olde Monmouth, including without limitations all communications to effect stock transfers by, on behalf of, or for the benefit of, any of the following individuals and/or entities:
  - a. Roys Poyiadjis
  - b. Lycourgos Kyprianou
  - c. AremisSoft
  - d. Quantum Group Management
  - e. Inlay Group Corporation
  - f. Drax Trading Limited
  - g. Emerging Markets Capital Group
  - h. Onyx Capital, Inc.
  - i. The Atlas Trust (a/k/a Atlas Trust)
  - j. Oracle Capital, Inc.
  - k. The Trident Trust (a/k/a Trident Trust)
  - l. Cronos Capital, Inc.
  - m. Olympus Capital Investment, Inc.
  - n. Aremis Holdings Limited

4. All documents concerning communications with Brown Brothers Harriman & Co. with respect to any of the entities or transactions described in Request No. 3 above.

5. All documents concerning communications with Fahnstock & Company, located in Red Bank, New Jersey, with respect to any of the transactions described in Request No. 3 above.

6. All documents concerning the Bank's efforts to advertise, market, solicit or otherwise publicize its services to residents of the United States and specifically to residents of New Jersey.

7. All documents the Bank consulted or which provided in part or whole the basis for the Bank's answer to Plaintiffs' jurisdiction interrogatories.

Dated: Florham Park, New Jersey  
July 6, 2009

GREENBERG TRAURIG, LLP

By: /s/ Hal M. Hirsch  
Hal M. Hirsch (HH 0417)  
David Jay (DJ 7221)  
200 Park Avenue  
Florham Park, New Jersey 07932  
(973) 360-7900

*Attorneys for the AremisSoft Liquidating  
Trust*